

<p style="text-align: right;">Page 1</p> <p>1 IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA</p> <p>2</p> <p>3 MICHAEL W. HILL, et al., : C.A. No. 05-160 Erie Plaintiff : C.A. No. 03-323 Erie</p> <p>4 : C.A. No. 03-355 Erie v. : C.A. No. 03-368 Erie</p> <p>5 : C.A. No. 04-011 Erie JOHN J. LAMANNA, et al., : Defendants :</p> <p>6</p> <p>7</p> <p>8</p> <p>9 Video Conference Deposition of DENISE TANNER, taken before and by Janis L. Ferguson, Notary Public in and for the Commonwealth of Pennsylvania, on Tuesday, December 5, 2006, commencing at 1:15 p.m., at the offices of the United States Attorney, 17 South Park Avenue, Suite A330, Erie, Pennsylvania 16501.</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15 For the Plaintiffs: Neal R. Devlin, Esquire Knox McLaughlin Gornall &amp; Sennett, PC 120 West 10th Street Erie, PA 16501</p> <p>16</p> <p>17 For the Defendants: Michael C. Colville, Esquire, AUSA Office of the United States Attorney 700 Grant Street, Suite 4000 Pittsburgh, PA 15219</p> <p>18</p> <p>19 Douglas Goldring, Esquire Federal Prison Industries (UNICOR) 400 First Street NW Washington, DC 20534</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24 Reported by Janis L. Ferguson, RPR Ferguson &amp; Holdnack Reporting, Inc.</p> <p>25</p>	<p style="text-align: right;">Page 3</p> <p>1 MR. DEVLIN: At our location, so you know, I'm 2 here, Neal Devlin. My paralegal, Lorie Watson, is 3 in the room as well. Also in the room is Janis 4 Ferguson. She's a court reporter. She's going to 5 be taking down everything everyone says and 6 putting it into a transcript.</p> <p>7 This is about the hardest type of deposition 8 Janis can do now, because she's with me, but can't 9 see you. So I'm going to ask that we do our best, 10 you and I, to not talk over one another and to 11 speak as slowly as you can, only because Janis is 12 not going to be able to see, quite frankly, your 13 lips as you're speaking, which is occasionally 14 helpful in transcribing.</p> <p>15 The other point, because we can't see each 16 other, but we're over a video connection, there is 17 a delay. It is a short delay, but there's 18 definitely is a delay between what I say -- when I 19 talk and when you hear it. Because of that, I 20 will do my best to pause when I'm done with a 21 question, and I would ask you to do the same when 22 you're done with your answer. Or even go so far 23 as to say that you're done with your answer. That 24 will prevent us from talking over one another. 25 If we start talking over one another, let's</p>
<p style="text-align: right;">Page 2</p> <p>1 INDEX</p> <p>2</p> <p>3 TESTIMONY OF DENISE TANNER</p> <p>4 Direct examination by Mr. Devlin ..... 3</p> <p>5 Cross-examination by Mr. Colville ..... 19</p> <p>6 Redirect examination by Mr. Devlin ..... 23</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 just agree that we'll both do our best to stop, 2 and if that occurs -- if that ever occurs, I will 3 be the first one to talk. I will get back and 4 either ask you to continue your answer or continue 5 my question or wherever we were.</p> <p>6 Is that fair enough?</p> <p>7 THE WITNESS: Yes.</p> <p>8</p> <p>9 DENISE TANNER, first having 10 been duly sworn, testified as follows:</p> <p>11</p> <p>12 DIRECT EXAMINATION</p> <p>13 BY MR. DEVLIN:</p> <p>14</p> <p>15 Q. Ms. Tanner, I represent Michael Hill and a number 16 of other inmates, former inmates or current inmates at FCI 17 McKean in a number of lawsuits involving -- generally 18 involving allegations arising out of these inmates' work in 19 the UNICOR facility, and in Michael Hill's case, also 20 involving some allegations involving some dental treatment 21 Mr. Hill received while an inmate at FCI McKean.</p> <p>22 We have asked for you to be deposed here today to 23 ask you some questions regarding your responsibility as what 24 I believe to be a records custodian or in the medical clinic 25 at FCI McKean.</p>

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<p style="text-align: right;">Page 5</p> <p>1 Before we get into the substance of the</p> <p>2 deposition, have you ever been deposed before?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Good. Then you have the general guidelines down.</p> <p>5 Try to keep all of your answers audible. Especially in this</p> <p>6 situation, nods of the head aren't going to work because we</p> <p>7 can't see you. And we'll do our best not to talk over one</p> <p>8 another.</p> <p>9 If at any point in time I ask you a question that</p> <p>10 you don't understand, just let me know that, and I will</p> <p>11 rephrase the question and try to make it understandable.</p> <p>12 And, also, if I ask you a question and you simply don't know</p> <p>13 the answer, that's fine. I'm not -- I don't want you to</p> <p>14 guess or speculate in this deposition. I simply want to get</p> <p>15 your own personal knowledge, the full extent of it, but</p> <p>16 nothing more than that. Okay?</p> <p>17 A. Yes, sir.</p> <p>18 Q. All right. Ms. Tanner, can you tell me where</p> <p>19 you're currently employed.</p> <p>20 A. FCI McKean, health services unit.</p> <p>21 Q. And what is your current position?</p> <p>22 A. Health information technician.</p> <p>23 Q. Okay. How long have you held that position?</p> <p>24 A. 15 years, sir.</p> <p>25 Q. And how long have you been employed at FCI McKean?</p>	<p style="text-align: right;">Page 7</p> <p>1 Q. What are your job duties as a health information</p> <p>2 technician at FCI McKean?</p> <p>3 A. I'm responsible for maintaining the inmates'</p> <p>4 medical records. I check in all the inmates as they come</p> <p>5 into the health clinic for appointments. I do scheduling on</p> <p>6 the computer, filing of the records. Just general</p> <p>7 recordkeeping information.</p> <p>8 Q. Okay. With respect to checking inmates in when</p> <p>9 they come to the medical clinic for an appointment, am I</p> <p>10 correct that the medical clinic has a central waiting room?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Okay. And is that where all inmates come in to</p> <p>13 request medical attention, whether it be a routine request,</p> <p>14 an emergency request, or a sick call request?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Okay. And as far as the physical layout of that</p> <p>17 room goes, where are you located in or next to that room?</p> <p>18 A. When you come into the first door, through the</p> <p>19 front sallyport of health services, I have a window that</p> <p>20 opens to that room to the right of that doorway as soon as</p> <p>21 you walk into health services.</p> <p>22 Q. How many health information technicians are on</p> <p>23 staff at any one point in time?</p> <p>24 A. There would be two of us.</p> <p>25 Q. Okay. Is that consistent -- are there always two</p>
<p style="text-align: right;">Page 6</p> <p>1 A. 16 years.</p> <p>2 Q. What did you do for the one year in which you were</p> <p>3 not a health information technician?</p> <p>4 A. For four months I was a unit secretary, and</p> <p>5 prior -- or after that, the last eight months, I was a</p> <p>6 health services secretary.</p> <p>7 Q. Was that at the beginning of your employment at</p> <p>8 FCI McKean?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Okay. Were you employed prior to being employed</p> <p>11 at FCI McKean?</p> <p>12 A. Yes, sir.</p> <p>13 Q. And how were you employed and by whom?</p> <p>14 A. I was employed at WRK as an intake timekeeper for</p> <p>15 the computer services.</p> <p>16 Q. And any employment before that?</p> <p>17 A. Yeah.</p> <p>18 Q. Well, take me back one more.</p> <p>19 A. I worked at the Chamber of Commerce in Bradford,</p> <p>20 Pennsylvania.</p> <p>21 Q. Okay. Other than your employment as a health</p> <p>22 information technician at FCI McKean, have you had any other</p> <p>23 employment involving the provision of medical care or in a</p> <p>24 medical office or a hospital?</p> <p>25 A. No, sir.</p>	<p style="text-align: right;">Page 8</p> <p>1 of you when the waiting room is open?</p> <p>2 A. Well, when we're both working, yes.</p> <p>3 Q. Are there points in time when only one of you is</p> <p>4 working?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Do you have set hours for your position?</p> <p>7 A. We work four 10-hour days. Our days off switch</p> <p>8 from Friday to Monday or Wednesday of the following week.</p> <p>9 We alternate between myself and Miss Petruzzi, who works</p> <p>10 with me.</p> <p>11 Q. You and Miss Petruzzi, are you the only two health</p> <p>12 information technicians at FCI McKean?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Between the two of you, whether working at the</p> <p>15 same time or only one of you, how often, or what are the</p> <p>16 hours in which the waiting room has a person -- has one of</p> <p>17 you available at the window to check in an inmate?</p> <p>18 A. Monday through Friday, there's somebody there from</p> <p>19 7:30 -- or 7:00 in the morning -- I'm sorry -- until 3:00 in</p> <p>20 the afternoon.</p> <p>21 Q. I take it, then, on Saturdays and Sundays, no</p> <p>22 one's there?</p> <p>23 A. No, sir.</p> <p>24 Q. If an inmate requires medical attention at a point</p> <p>25 in time when the waiting room, let's say, is not open, I</p>

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<p style="text-align: right;">Page 9</p> <p>1 understand that there are avenues by which inmates can  2 request that -- that medical attention. How do they  3 physically get to see the doctor in that instance?  4 A. They have to have their unit officer or their job  5 supervisor call on the radio to the duty PA. And he or she  6 will decide when and at what time they can be seen by the --  7 by themselves.  8 Q. Okay. With respect to an inmate coming in for an  9 appointment, am I -- well, it's my understanding that Monday  10 through Fridays, there's a period of time called sick call  11 in which inmates can come in with emergent problems to seek  12 treatment. Is that correct?  13 A. Yes, sir.  14 Q. Okay. Describe for me the procedure in general  15 that an inmate would go through if he showed up for sick  16 call on any given day.  17 A. Sick call for the medical side is Monday, Tuesday,  18 Thursday, and Friday from 7:10 a.m. until 7:40 a.m., at  19 which time an inmate can walk into health services, talk to  20 the PA or the paramedic at that window at medical records  21 and request to be seen. They have to give him -- they --  22 the paramedic will give them a sick call slip, it's called.  23 It's just a piece of paper having the inmate request the  24 reason why he needs to be seen. The inmate will fill it  25 out, and that paramedic or PA will determine whether he</p>	<p style="text-align: right;">Page 11</p> <p>1 certain conditions that are determined by Dr. Olsten, the  2 clinical director, are seen within 72 hours, and other  3 conditions can be put out to 14 days, such as rashes -- you  4 know, nonemergent conditions.  5 Q. Where does the cop-out form fall within that  6 procedure? That's something that we've heard about a little  7 bit in other depositions.  8 A. An inmate can fill out a sick call cop-out form,  9 and there is a box right outside to the left of my window  10 when they walk -- when an inmate would walk into health  11 services, and they can put that slip either in that box, or  12 they can hand it to that paramedic or PA that is triaging  13 the sick call to be reviewed by them. If it is placed in  14 the box, either myself or Miss Petruzzi gets it out two or  15 three times a day, and we schedule them within that 14-day  16 time frame.  17 Q. How about for dental claims raised in a cop-out  18 form?  19 A. The dental people schedule their own, sir.  20 Q. Okay. And who would the dental people be?  21 A. The dental assistants, the hygienist, and the  22 dentist that currently contracts with us.  23 Q. Okay. What you've just described for me is the  24 present procedure; is that correct?  25 A. Yes, sir.</p>
<p style="text-align: right;">Page 10</p> <p>1 needs to be seen today or an appointment to be scheduled.  2 If they are there to be seen by the dentist, then  3 they are scheduled that day, and the dental people call them  4 in and see them one on one as necessary.  5 Q. Okay. So that I make sure I understand, with  6 respect to the dental side of it, is there also the  7 possibility that the initial person doing the intake and  8 reviewing the complaint could make the determination that  9 they would be seen at a later time, or are all people who  10 show up for sick call for the dental seen that day?  11 A. All people that show up for dental are seen that  12 day.  13 Q. Okay. How about routine care? How does that  14 work?  15 A. For the dentist?  16 Q. Yes, let's start with the dentist.  17 A. I do believe they have -- routine care for the  18 dental, they have to go through the process of having their  19 teeth cleaned and to be checked by the dentist. And then  20 they schedule for an appointment as time permits for their  21 scheduling.  22 Q. How about for the nondental?  23 A. For medical side? It -- it depends on  24 their -- what is wrong with them; that they are having pain,  25 fever, bleeding. They are seen immediately if it's --</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. Okay. Back in --  2 A. Present and past.  3 Q. Okay. And that was my question. Back in 2001,  4 was there any difference in the procedure specifically with  5 respect to the cop-out form?  6 A. No, sir.  7 Q. Okay. Let me ask this question: And this is a  8 question where us not seeing each other may present a  9 problem. But I know that Attorney Colville and Attorney  10 Goldring have this document. There is a document that  11 unfortunately, ma'am, I can't show you, and I apologize for  12 that. The only reason I can't show you is because we don't  13 have the video hooked up.  14 But there was a document introduced in a previous  15 deposition of Dr. Collins marked Deposition Exhibit No. 3.  16 MR. DEVLIN: Mike and Doug, do you still have  17 that?  18 MR. COLVILLE: Yes.  19 Q. Ma'am, that document is an Inmate Request to Staff  20 form. It was submitted -- or it purports to be submitted by  21 Michael Hill on December 3rd, 2001, and it is, in general  22 terms -- and Mike and Doug can certainly raise an objection  23 if they think I'm misstating this. It discusses his request  24 for some dental treatment related to two cavities. That  25 form was signed -- it appears to be signed by you. It's</p>

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1 signed D. Tanner, HIT.

2 The reason I'm asking you about that is I want to  
3 make sure I have an understanding as to how cop-out forms  
4 are handled on the dental side. And based on your previous  
5 testimony, it was my understanding that they would go  
6 directly to a hygienist, an assistant, or the dentist on  
7 call.

8 So I want to know how it is that you ended up  
9 signing the signature of the staff member for this cop-out  
10 form.

11 A. There was a time frame where the dental did not  
12 have a dental assistant, and in order to keep up with the  
13 paperwork, I was helping with the cop-outs as they -- you  
14 know, telling them they would be seen on sick call, come to  
15 sick call, where they are at on the sick call list, if they  
16 signed up for dental cleaning, et cetera.

17 Q. Okay. And, in fact, in the interest of full  
18 disclosure here, the other cop-out form that I have, which  
19 is dated April 8th, 2002, is signed by Amber Douglas, which  
20 is CDA. Is that a certified dental assistant?

21 A. Yes, sir.

22 Q. All right. So am I correct, then, that at least  
23 as of December 3rd of 2001, if someone were to submit a  
24 dental cop-out form, it would be reviewed by either you or  
25 Ms. Petruzzini?

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1 A. Yes, sir.

2 Q. Okay. And what would you --

3 A. Only me.

4 Q. Okay. And what would you do with that form? What  
5 would your review be, and then based upon sort of whatever  
6 options on that review, what would happen?

7 A. Well, it depends on what was on the sick call --  
8 or what was on the cop-out form. If it was talking of  
9 routine care, he would be told to come to sick call or he  
10 would be given the procedure on how to obtain dental  
11 cleaning. If it talks about pain, he would be referred,  
12 again, to sick call and given a time to come to sick call.

13 Q. Okay. Would you generally send these cop-out  
14 forms on to Dr. Collins for his review?

15 A. Yes, sir.

16 Q. When you did that, would that occur before or  
17 after you made a disposition of the cop-out form?

18 A. Before, sir.

19 Q. Okay. Would you send it to him with a  
20 recommendation or your initial review, or would it simply go  
21 to him, and then you two would talk about what to do?

22 A. It would go to him, and then he would -- he would  
23 tell me what to write for him.

24 Q. All right. If a person submitted -- again, only  
25 on the dental side of this, although I will want to ask you

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1 some questions about medical. But on the dental side, if an  
2 inmate submitted a dental cop-out form in which it was  
3 determined that they did not require immediate care and,  
4 therefore, would be put on a routine list, how did that  
5 work? How was that list compiled? Where would they fall  
6 in, and then what would happen?

7 A. If their name went on the routine care list for  
8 whatever date that you received it, I would enter it into  
9 the Century system, the computer system that the Bureau of  
10 Prisons uses, and their name would go to the bottom of the  
11 waiting list. And as their name came to the top of the  
12 list, as they took people off the dental cleaning, their  
13 name would move up on that list.

14 Q. And is it your understanding that in order to have  
15 routine care done, the first step from a care perspective  
16 would be to have a cleaning on the dental side? Is that  
17 right?

18 A. That's my understanding, sir.

19 Q. All right. Ma'am, do you have -- do you recall  
20 Michael Hill as an inmate at FCI McKean?

21 A. No, sir, I don't.

22 Q. Were there times at FCI McKean when an inmate  
23 would be abusing either sick call or the cop-out procedure?  
24 And by abusing, what I mean is using that procedure or  
25 attempting to get medical care sort of on systematic basis

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1 that you felt was frivolous or unnecessary.

2 MR. COLVILLE: I'll object to the form, but you  
3 can answer, Miss Tanner.

4 A. Could you repeat the question?

5 Q. Sure. What I'm trying to get at is, I'm trying to  
6 understand if it ever occurred where an inmate would just  
7 keep coming to try to get care, to the point where it became  
8 a problem and something had to happen. I'm asking if that  
9 ever occurred.

10 MR. COLVILLE: Same objection.

11 MR. DEVLIN: Mike, what is the objection, just so  
12 I know?

13 MR. COLVILLE: Form.

14 Q. Go ahead. You can answer, Miss Tanner.

15 MR. COLVILLE: You can answer.

16 A. Well, I don't really see the patients, so I really  
17 can't answer whether -- you know, in my opinion or not, no.

18 Q. Okay. Not necessarily your opinion. But in your  
19 capacity as the -- I guess for lack of a better word, person  
20 handling the intake on folks with sick call, would there be  
21 people who simply repeatedly showed up for sick call all the  
22 time?

23 A. Yes, we have certain inmates that come more often  
24 than others.

25 Q. Okay. And those inmates that come more often, is

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<p style="text-align: right;">Page 17</p> <p>1 there any procedure or any practice that's been employed to 2 address that?</p> <p>3 A. No. They are all -- they are all treated the 4 same, sir.</p> <p>5 Q. Okay. If an inmate comes in on sick call with a 6 complaint -- I know you've already told me that that comes 7 in and a determination is made as to whether that person -- 8 that inmate will be seen that day or at some subsequent 9 time. Is that correct?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Okay. So regardless of whether an inmate came 12 every day to sick call with the same complaint, that 13 complaint would be looked at, and if they were going to be 14 placed on a -- scheduled for an appointment at a later date, 15 that would occur, and that's the end of it?</p> <p>16 A. Yes, sir.</p> <p>17 Q. With respect to inmates in the special housing 18 unit, how is their medical care arranged for?</p> <p>19 A. They are seen every day by the paramedic or the 20 PA. That's Monday through Sunday. If they have a medical 21 complaint, that complaint is addressed at that point. If 22 they have a dental complaint, the PA or paramedic brings the 23 name and the number of the inmate over to the dental clinic, 24 and they schedule as appropriate.</p> <p>25 Q. Ma'am, have you ever personally advised anyone or</p>	<p style="text-align: right;">Page 19</p> <p>1 follow-up questions, but it won't take long.</p> <p>2</p> <p>3 CROSS-EXAMINATION</p> <p>4 BY MR. COLVILLE:</p> <p>5</p> <p>6 Q. Miss Tanner, in this case, Mr. Hill previously 7 testified that during one of his visits to the medical 8 clinic, that there were two records employees -- let me see 9 exactly how he describes -- records office ladies is how he 10 describes the two people. And he claims that the two -- one 11 of the two records ladies in the medical clinic told him 12 that if he came back, that they were going to put him in the 13 SHU.</p> <p>14 Now, with that -- with that background information 15 available to you, let me ask you this: Back in 2001 and 16 2002, how many people worked in the records office?</p> <p>17 A. There was two of us, sir.</p> <p>18 Q. All right. And who were they?</p> <p>19 A. Myself and Miss Petruzzi.</p> <p>20 Q. Were there any other people in the records office 21 other than you and Miss Petruzzi?</p> <p>22 A. Working in the records office?</p> <p>23 Q. Well, yes.</p> <p>24 A. Not working in there, sir. But the records office 25 is a common area that numerous people come in and out, and</p>
<p style="text-align: right;">Page 18</p> <p>1 ever seen anyone be advised that as a result of coming into 2 the waiting room or seeking care, they would be placed in 3 the special housing unit?</p> <p>4 A. No, sir.</p> <p>5 Q. You have never -- and you have never heard anyone 6 else say that?</p> <p>7 A. No, sir.</p> <p>8 Q. Okay. Do you know if there's any procedure 9 whereby if an inmate is deemed to be abusing their ability 10 to seek medical treatment through sick call, they would be 11 placed in the special housing unit?</p> <p>12 A. No, sir.</p> <p>13 Q. And it was a poor question, which is why I have to 14 ask the follow-up. You don't know if there's a procedure, 15 or there is not such a procedure?</p> <p>16 A. There's no procedure.</p> <p>17 Q. Okay. So to the best of your knowledge, no inmate 18 is ever -- has ever been placed in the special housing unit 19 due to seeking medical treatment, regardless of how often or 20 how frivolous, through sick call.</p> <p>21 A. No, sir.</p> <p>22 MR. DEVLIN: Ma'am, those are all the questions 23 that I have. I don't know if Mike or Doug have 24 any.</p> <p>25 MR. COLVILLE: Yeah, I think I have a couple</p>	<p style="text-align: right;">Page 20</p> <p>1 they talk to the inmates at that window.</p> <p>2 Q. But were you and Miss Petruzzi the only two people 3 who were employed as office records custodians?</p> <p>4 A. Yes, sir.</p> <p>5 Q. All right. Did you or Miss Petruzzi ever make a 6 statement to Mr. Hill that if he came back, he would be put 7 in the SHU?</p> <p>8 A. Not that I recall, sir.</p> <p>9 Q. All right. If Mr. Hill or any other inmate, for 10 that matter, were to show up at the medical clinic in the 11 morning for sick call, would that be documented?</p> <p>12 A. No, sir, we don't document it.</p> <p>13 Q. All right. How, then, would anybody -- would 14 anybody be able to tell if Mr. Hill came on any given day to 15 medical clinic to complain about a problem with his tooth?</p> <p>16 A. If he was to be seen by the dentist, it would be 17 documented in his medical record.</p> <p>18 Q. Okay. If Mr. Hill or any other inmate, for that 19 matter, came to sick call and complained about pain with 20 regard to a tooth, do you know of any circumstance or any 21 incident where that person was told he couldn't see the 22 dentist that day at sick call?</p> <p>23 A. No, sir.</p> <p>24 Q. If an inmate came to sick call and complained 25 about pain, is it then fair to say that that person would be</p>

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<p style="text-align: right;">Page 21</p> <p>1 seen that day, no matter what; whether the complaint was an</p> <p>2 accurate complaint or an inaccurate complaint?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Do you know of any other -- do you know of any</p> <p>5 incident where that did not occur, where somebody complained</p> <p>6 of pain and wasn't seen that day?</p> <p>7 A. No, sir.</p> <p>8 Q. The cop-out forms that were referenced that you</p> <p>9 would have signed off on, would an inmate have to prepare a</p> <p>10 cop-out form if he wanted to be seen in sick call?</p> <p>11 A. No, sir.</p> <p>12 Q. And when an inmate is in the SHU, you stated</p> <p>13 earlier that he or she is seen every day by some medical</p> <p>14 professional. Is that right?</p> <p>15 A. Yes. If they requested -- apparently, it's my</p> <p>16 understanding that they have to put a note or they have to</p> <p>17 stand by the door -- the SHU doors have a window in it, and</p> <p>18 they have to be standing by the door when the PA comes</p> <p>19 through. When he goes down range, he hollers "sick call",</p> <p>20 and that's an indication to them that the medical staff is</p> <p>21 on board.</p> <p>22 Q. Now, let's just say, for instance, that on one</p> <p>23 day, some inmate that's in SHU during that time that sick</p> <p>24 call is called by the medical personnel in the SHU, if that</p> <p>25 person complains about pain or says, I have -- I need to go</p>	<p style="text-align: right;">Page 23</p> <p>1 A. They don't physically bring him over. They take</p> <p>2 their name and number and bring it to the dentist.</p> <p>3 Q. I see. Do you know what -- does the dentist then</p> <p>4 go to the SHU?</p> <p>5 A. No. If he feels that the condition is warranted,</p> <p>6 then they have the inmate brought to the dental clinic.</p> <p>7 Q. So there would be documentation that would exist</p> <p>8 that the PA would have to take to the dentist and say, I</p> <p>9 have somebody in SHU who is complaining about pain?</p> <p>10 A. It might just be a slip of paper that they write</p> <p>11 down what the -- you know, how the dentist documents it and</p> <p>12 keeps that information, I -- I couldn't tell you, sir.</p> <p>13 Q. Okay.</p> <p>14 MR. COLVILLE: That's all I have. Thanks, Miss</p> <p>15 Tanner.</p> <p>16 THE WITNESS: Thank you.</p> <p>17 (Discussion held off the record.)</p> <p>18 MR. DEVLIN: Miss Tanner, I do have a few</p> <p>19 follow-ups.</p> <p>20</p> <p>21 REDIRECT EXAMINATION</p> <p>22 BY MR. DEVLIN:</p> <p>23</p> <p>24 Q. In your capacity as being there in sick call and</p> <p>25 seeing the complaints, were there ever any recurring medical</p>
<p style="text-align: right;">Page 22</p> <p>1 to sick call, would they be seen that day?</p> <p>2 A. Yes. The paramedic or PA talks to them at that</p> <p>3 time, figures out -- figures out with them what the</p> <p>4 complaint is, and then it is addressed at that time. If it</p> <p>5 is for dental, the paramedic or PA brings that name and</p> <p>6 number of the inmate back to the dental clinic, and then the</p> <p>7 dental clinic people will take care of it from there.</p> <p>8 Q. All right. Let me pose a hypothetical to you.</p> <p>9 Let's just say that -- and I'll go back to you and</p> <p>10 Miss Petruzzi. Let's say an inmate came in one day at sick</p> <p>11 call time and said, Miss Tanner, I have a -- I have a</p> <p>12 toothache, and you, in your heart, believe that this person</p> <p>13 is faking it; that he didn't have any pain and was just</p> <p>14 making it up. Would you be able to send that patient back</p> <p>15 to his cell or tell him that he couldn't see the dentist</p> <p>16 that day, or would you be required to forward that patient</p> <p>17 on to the dentist by virtue of the fact that he was</p> <p>18 complaining of pain, whether you believed it or not?</p> <p>19 A. We have to forward him on to the dentist, sir.</p> <p>20 Q. Do you know whether or not that's the same</p> <p>21 situation in the SHU unit; where if somebody in the SHU</p> <p>22 complained of pain, even though he may have been making it</p> <p>23 up or it may not have been an accurate statement, would the</p> <p>24 PA be required to take the patient to the dentist to be</p> <p>25 seen?</p>	<p style="text-align: right;">Page 24</p> <p>1 complaints that happened more often than others?</p> <p>2 A. Can you clarify that, please?</p> <p>3 Q. Sure. Sure.</p> <p>4 A. Are you talking the medical side or the dental?</p> <p>5 Q. Now I'm talking the medical side. On the medical</p> <p>6 side, was there ever any -- for instance, was there a high</p> <p>7 incidence of people coming in with respiratory complaints or</p> <p>8 with skin complaints or with complaints about chest pain or</p> <p>9 any -- any specific ailment that during your period of time</p> <p>10 at FCI McKean has been more prevalent than other ailments?</p> <p>11 MR. COLVILLE: I'll object to the form. You can</p> <p>12 answer, Miss Tanner.</p> <p>13 A. No. During cold and flu season, of course, you</p> <p>14 have the colds, the flu. During the summertime, it's mainly</p> <p>15 heat rashes. Nothing that stands out in my memory as</p> <p>16 something that is over and over and over again, no, sir.</p> <p>17 Q. Okay. This may be a dumb question, and if it is,</p> <p>18 I apologize. But the medical clinic -- the employees of the</p> <p>19 prison, are they ever seen in the medical clinic?</p> <p>20 A. If they get injured on the job, they are brought</p> <p>21 over, but then they are referred out to the local hospital</p> <p>22 or to their physicians.</p> <p>23 Q. Okay. Okay.</p> <p>24 A. But they are not treated here, no.</p> <p>25 Q. Okay.</p>

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1 MR. DEVLIN: Those are all the questions I have,  
2 ma'am.

3 MR. COLVILLE: We'll waive signature also.

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5 (Deposition concluded at 1:50 p.m.)  
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